

1 Jennifer Lynch (SBN 240701)  
jlynch@eff.org  
2 Marcia Hoffmann (SBN 250087)  
marcia@eff.org  
3 ELECTRONIC FRONTIER FOUNDATION  
4 454 Shotwell Street  
San Francisco, CA 94110  
Telephone: (415) 436-9333  
5 Facsimile: (415) 436-9993

6 Jason M. Schultz (SBN 212600)  
jschultz@law.berkeley.edu  
7 SAMUELSON LAW, TECHNOLOGY  
8 & PUBLIC POLICY CLINIC  
UC Berkeley School of Law  
9 396 Simon Hall  
Berkeley, CA 94720-7200  
10 Telephone: (510) 642-0499  
Facsimile: (510) 643-4625

11 Attorneys for Plaintiff  
12 Electronic Frontier Foundation

13  
14 IN THE UNITED STATES DISTRICT COURT  
15 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
16 SAN FRANCISCO DIVISION

17 ELECTRONIC FRONTIER FOUNDATION, )  
18 )

19 Plaintiff, )

20 vs. )

21 DEPARTMENT OF DEFENSE, ET AL., )

22 Defendants. )  
23 )  
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26 )  
27 )  
28 )

Case No. 3:09-CV-05640-SI

**STIPULATION AND [PROPOSED]  
ORDER FOR BRIEFING SCHEDULE**

) Judge: Hon. Susan Illston

) Date: February 25, 2011

) Time: 2:30 p.m.

) Place: Courtroom 10, 19<sup>th</sup> Floor

1 This matter came on for a status hearing before the Court on February 25, 2011. In  
2 preparation for the status hearing, the parties have conferred and agreed to a procedure intended to  
3 streamline the resolution of the remaining issues in this lawsuit. In furtherance of this objective,  
4 and with the goal of making the most efficient use of scarce judicial resources, the parties have  
5 agreed to the following deadlines in this case. The parties jointly request that the Court adopt the  
6 parties' proposed schedule.

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8	Defendants DHS/ICE complete search and production	
9	of all documents.	May 25, 2011
10	Defendants DHS/ICE provide Plaintiff with a draft <i>Vaughn</i>	
11	index and a description of their searches.	July 1, 2011
12	Plaintiff will inform DHS/ICE of the documents and redactions	
13	on which it would like to proceed to summary judgment.	August 8, 2011
14	Defendants Secret Service, FBI, Criminal Division, DHS,	
15	and ICE move for summary judgment and file <i>Vaughn</i> indexes	September 23, 2011
16	with the Court.	
17	Plaintiff files opposition and cross-moves for summary judgment.	October 21, 2011
18	Defendants file reply and opposition to Plaintiff's motion.	November 4, 2011
19	Plaintiff files reply in support of motion for summary judgment.	November 18, 2011
20	Oral argument.	December 9, 2011
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DATED: February 28, 2011

Respectfully submitted,

/s/ Jennifer Lynch  
ELECTRONIC FRONTIER FOUNDATION  
Jennifer Lynch, Esq.  
Marcia Hofmann, Esq.  
454 Shotwell Street  
San Francisco, CA 94110  
Telephone: (415) 436-9333  
Facsimile: (415) 436-9993

TONY WEST  
Assistant Attorney General

JOHN TYLER  
Assistant Branch Director

SAMUELSON LAW, TECHNOLOGY  
AND PUBLIC POLICY CLINIC  
Jason M. Schultz  
U.C. Berkeley School of Law  
396 Simon Hall  
Berkeley, CA 94720-7200  
Telephone: (510) 642-0499  
Facsimile: (510) 643-4625

/s/ Kimberly Herb  
Kimberly L. Herb  
Trial Attorney  
United States Department of Justice  
Civil Division, Federal Programs Branch  
20 Massachusetts Ave. NW  
Washington, DC 20530  
Telephone: (202) 305-8356  
Facsimile: (202) 616-8470  
E-mail: Kimberly.L.Herb@usdoj.gov

Attorneys for Defendants

Attorneys for Plaintiff

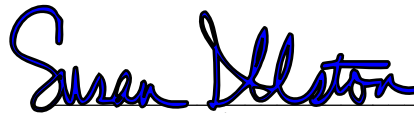
**GENERAL ORDER NO. 45(X) CERTIFICATION**

I attest that I have obtained Kimberly Herb's concurrence in the filing of this document.

/s/ Jennifer Lynch  
Jennifer Lynch

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 2/28/11



Hon. Susan Ilston

United States District Judge